

July 24, 2007

ITPD-07-F025A: BT Part 15C / DSS / EA818243

ITPD-07-F025B: WLAN Part 15C / DTS / EA350690

ITPD-07-F025C: UNII Part 15E / NII / EA175267

ITPD-07-F025D: HSDPA Parts 22H, 24E / PCB / EA421134

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046 USA

Subject: Authority to Act as FCC Agent for Panasonic Portable Personal Computer Model CF-19 Family
With Alps Bluetooth, Intel WLAN(a+b+g) and Novatel HSDPA
Original Application for FCC Certification for FCC ID: ACJ9TGCF-197

To Whom It May Concern:

On behalf of Panasonic Corp. of North America, we hereby authorize PCTEST Engineering Laboratory, Inc., to act on our behalf in matters relating to FCC equipment authorization, including the signing of documents relating to these matters. Any and all acts carried out by PCTEST on our behalf shall have the same effect as acts of our own. This project represents Portable Personal Computer, Model CF-19 Family with Intel Core 2 Duo 1.06 GHz and Tablet LCD with side panel spacers, which will be marketed under FCC ID: ACJ9TGCF-197. This product will be marketed with the following co-located transmitters:

(1) Alps Bluetooth, Model UGNZA

(Alps has no FCC ID):

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	DSS	2402~2480	0.01914

(2) Intel WLAN (a+b+g), Model WM4965AG (Intel FCC ID: PD94965AG)

This device complies with Dynamic Frequency Selection requirements in R&O FCC 03-287 as a client only device without radar detection capability.

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(g)	2412~2462	0.01914
Part 15C	802.11(a)	5745~5825	0.02393
Part 15E	802.11(a) Low Band	5180~5240	0.02042
Part 15E	802.11(a) High Band	5260~5320	0.01824

(3) Novatel HSDPA3.6, Model EU860D (Novatel FCC ID: NBZNRM-EU860D)

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>	<u>Emission Designator</u>
Part 22H	Cellular GSM	824.2~848.8	0.507 W ERP	243KGXW
Part 22H	Cellular EDGE	824.2~848.8	0.282 W ERP	246KG7W
Part 22H	Cellular WCDMA	826.4~846.6	0.075 W ERP	4M18F9W
Part 24E	PCS GSM	1850.2~1909.8	1.734 W EIRP	246KGXW
Part 24E	PCS EDGE	1850.2~1909.8	0.971 W EIRP	246KG7W
Part 24E	PSC WCDMA	1852.4~1907.6	0.310 W EIRP	4M19F9W

The highest reported Body SAR values measured with LCD spacers and LCD in flip position:

0.264 W/kg Cellular HSDPA / 0.438 W/kg PCS HSDPA

0.517 W/kg Cellular GPRS / 0.308 W/kg PCS GPRS

0.066 W/kg (802.11b) / 0.030 W/kg BT (2.4 GHz)

0.592 W/kg (802.11a / 5.2 GHz) / 0.647 W/kg (802.11a / 5.3 GHz) / 0.778 W/kg (802.11a / 5.8 GHz)

This PC contains the following Inverted-F type transmitter antennas, which are all located within the LCD panel:
(1) BT TX/RX antenna with 3.06 dBi antenna gain; (2) WLAN Main TX/RX and Aux TX/RX antennas with 2.48 dBi and 3.31 dBi antenna gains; and (3) HSDPA Main TX/RX antennas with 1.84 dBi and Aux Rx only antenna.

Past reported PC under FCC ID: ACJ9TGCF-193 was already FCC certified with optional Car Mounter Model CF-WEB184, which is provided with passive RF pass-thru with two TNC connectors intended for WLAN and WWAN external antennas. One external antenna connector is intended for connection to Radiall/Larsen WLAN 2.4 GHz Base Whip antenna, type NM05E2400BKTNC with 5dBi antenna gain. The other antenna connector is intended for connection of licensed radio service and the WWAN antenna and must be professionally installed. The Supplemental Car Mounter instructions is provided with recommended maximum external antenna gain of 9.85dBi for 824.7~848.31 MHz and 8.34dBi for 1851.25~1908.75 MHz. The optional Car Mounter Model CF-WEB184 RF Exposure Evaluation was satisfied by the provided Maximum Permissive Exposure calculation for mobile operation.

The PC's main User Manual gives all FCC required notices and warning, including RF Exposure Warning and the below type information:

Only for models with wireless LAN>

- This product is restricted to indoor use due to its operation in the 5.15 to 5.25 GHz frequency range. FCC requires this product to be used indoors for the frequency range 5.15 to 5.25 GHz to reduce the potential for harmful interference to co-channel Mobile Satellite systems. High power radars are allocated as primary users of the 5.25 to 5.35 GHz and 5.65 to 5.85 GHz bands. These radar stations can cause interference with and /or damage this product.
- The WLAN external antenna connector is intended for connection to Radiall/Larsen WLAN Base Whip antenna, type NM05E2400BKTNC with 5 dBi antenna. The WWAN external antenna connector is intended for professional installation and should not exceed maximum antenna gain of 9.85 dBi for 824.7 - 848.31 MHz operation and 8.34 dBi for 1851.25 - 1908.75 MHz

In accordance with provisions of Section 0.457(d) of the Commission's Rules and Section 552(b)(4) of the Freedom of Information Act, we request permanent confidentiality for transmitter's exhibits, which contain Operation Description, Parts Lists & Tune-Up Procedure, Block Diagram and Schematic Diagram. The BT and WLAN transmitters are not user adjustable and do not have a Tune-Up Procedure. These exhibits contain proprietary, confidential and trade secrets material, which would not be routinely made available for public inspection. Also, in accordance with FCC Public DA 04-1705, we request short-term confidentiality for exhibits, which contain External Photographs, Internal Photographs, Test Setup Photographs and the User Manual. These exhibits contain pre-market information, which could give our competitors unfair advantage should this information be released before this product is actually introduced into the common marketplace.

Sincerely yours,

Richard Mullen

Richard Mullen
Group Manager